

IN THE UNITED STATES SOUTHERN DISTRICT COURT OF WEST VIRGINIA

ROBERT PEREZ,

Plaintiff,

v.

CASE NO. *2:16-cv-1606*

WEST VIRGINIA-AMERICAN WATER COMPANY,  
AMERICAN WATER COMPANY, and EASTMAN  
CHEMICAL COMPANY.

Defendant.

### COMPLAINT

Your Plaintiff Robert Perez for his Complaint does swear and allege as follows:

#### I.

That the Plaintiffs is currently a resident of Ashland, Kentucky. That on or about the 16<sup>th</sup> day of February, 2014, my home at 4904 Big Tyler Road, Cross Lanes, Kanawha County, West Virginia, caught on fire during a break in the waterline in my area causing low to no water pressure for the fire department to extinguish the fire. Neighboring fire departments attempted to bring water, but were unsuccessful in extinguishing the house fire.

#### III.

That personnel from Defendant West Virginia-American Water Company technician working on the nearby water lines attempted to extinguish the fire with a fire extinguisher in the garage but was unsuccessful. That fire spread from the garage to the main home and the home was totally destroyed by fire as a result of the broken water lines that were the result of the improper flushing of the systems that caused lines to break in the area.

IV.

That, in addition, the water line breakage happened during the toxic spill flushing or improper flushing that caused lines to break in the area causing low or no water pressure, and in addition to Defendant American Water failing to understand the threat to water supply that it failed to maintain adequate water reserves, and that it failed to keep proper filtration and/or that it failed to take proper actions after it learned of the chemical leaks.

V.

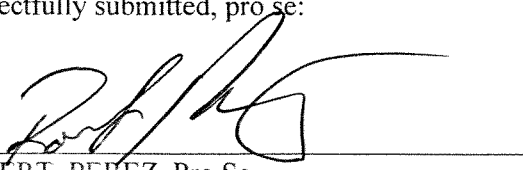
That the Plaintiff endured personal injury, damages for the loss of his home and personal property, loss of unreasonable inferences with the use of property, fear, anxiety, annoyance or inconvenience due to the actions of the Defendants.

P R A Y E R

Your Plaintiff Robert Perez does pray for the following relief:

1. That this Complaint be filed and served upon the Defendants.
2. That the Court find in favor of the Plaintiff with respect to his damages as deemed proper by the Court.
3. That the Plaintiff does demand a jury trial.

Respectfully submitted, pro se:



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